

Message

From: Moran, Robin [moran.rob@epa.gov]
Sent: 10/31/2018 6:51:05 PM
To: Charmley, William [charmley.william@epa.gov]; Bolon, Kevin [Bolon.Kevin@epa.gov]; Olechiw, Michael [olechiw.michael@epa.gov]; Cherry, Jeff [Cherry.Jeff@epa.gov]; Sherwood, Todd [sherwood.todd@epa.gov]
Subject: BorgWarner comments -- to have handy during meeting
Attachments: BorgWarner.pdf

“We recommend an approach different from those proposed in the NPRM:

- ☐ **Beginning in model year (MY) 2018, standards should be reset to the levels the industry actually achieved.**
- ☐ **For MY 2018 and beyond, succeeding model year targets should be set with an annual rate of improvement defined by the slope of improvement the industry has achieved over the last six years.”**
[graph below says this = 2%/year]

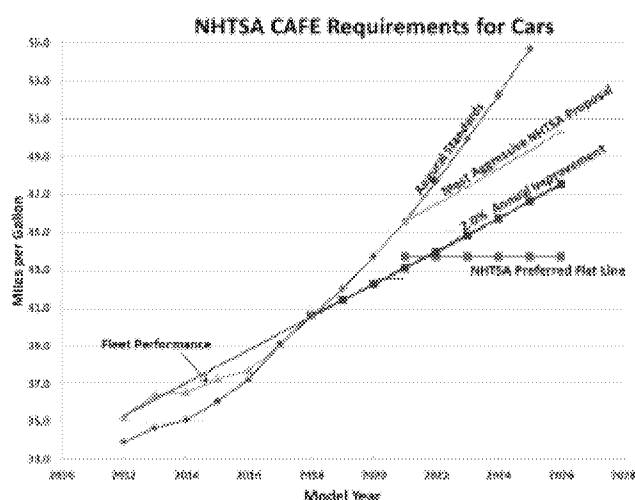


Figure 3

Figure 3 (left) shows the past CAFE performance of the passenger car fleet with projections based on the range of options presented in the NPRM. A line representing a 2.0% annual improvement is also shown, which matches the rate of improvement between 2012 and 2018.